REMARKS

I. Introduction

Claim 14 is added. Therefore, by this Amendment, claims 1-14 are all the claims pending in the application. For the reasons given below, Applicant respectfully requests withdrawal of the rejections and allowance of all the pending claims.

II. Formalities

Applicant thanks the Examiner for acknowledging receipt of all of the priority documents filed on March 12, 1999 under 35 U.S.C. § 119.

Applicant also thanks the Examiner for initialing and signing the Information Disclosure Statement filed on June 19, 2001 to indicate her consideration of the references cited therein. Applicant, however, requests that the Examiner also initial, sign, and return a copy of the Information Disclosure Statement filed on April 27, 1999 to indicate her consideration of the references cited therein. Applicant respectfully requests that the Examiner return this IDS by either facsimile (to the attention of the undersigned attorney at 202-293-7860) or in the next correspondence.

Finally, the Applicant notes the Draftsperson's objections to the drawings as indicated on Form PTO-948. Applicant submits herewith formal drawings to overcome these objections.

III. Claims 1-8, 10, and 12-13 are patentable over U.S. Patent No. 5,956,681, issued to Yamakita

Claims 1-8, 10, and 12-13 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 5,956,681, issued to Yamakita (hereinafter "Yamakita").

Regarding claim 1, Applicant submits that Yamakita fails to teach or suggest **all** of the features recited in claim 1, as required for a *prima facie* case of obviousness under § 103. Specifically, Yamakita fails to disclose at least the following limitations:

> a workflow control table which stores the species, the destination, and the operation assigned to each operation document; and an image identifying server for identifying the species of the operation document from the operation document image to retrieve the species stored in the workflow control table in response to the identified species, to automatically recognize the corresponding destination and operation, and to transmit a recognized result to the network.

Claim 1 discloses <u>a workflow control table which stores the species, the destination, and the operation assigned to each operation document</u>. While Yamakita does disclose a processing terminal registration table, this table is nothing like Applicant's workflow control table. *Cf., e.g.,* Fig. 10 of Yamakita and Applicant's Fig. 4. As recited in claim 1, Applicant's workflow control table stores the species identifying an operation document image, the destination(s) of the operation document image, and the operation(s) to be performed on the operation document image.

In contrast, the processing terminal registration table of Yamakita (*see, e.g.,* Fig. 10 of Yamakita) stores, *inter alia*, a terminal identification code, a transmission source IP address, a format type, a speech buffer file name, a text buffer file name, and a formatted text buffer file name. The terminal identification code refers to a mobile terminal that transmits a text speech

recognition/formatting start request command. *See, e.g.,* col. 26, lines 62-66. The transmission

source IP address is the IP address for the aforementioned mobile terminal. *See, e.g.,* col. 27,

lines 10-14. The format type stores data relating to how the text data is to be formatted. *See,*

e.g., col. 5, lines 28-44. Finally, the speech buffer file name, the text buffer file name, and the

formatted text buffer file name identify the files for respectively storing the received speech data,

the recognized speech text data, and the formatted text data. *See, e.g.,* col. 27, lines 1-5. No

fields of the processing terminal registration table are devoted to storing a species for identifying

an operation document image, a destination of an operation document image, or an operation for

an operation document image, as recited in claim 1. Indeed, Yamakita makes no reference to

operation document images, as used in a workflow system.

Yamakita also fails to teach or suggest (1) an image identifying server that identifies the

species of an operation document from an operation document image, (2) that retrieves the

species stored in the workflow control table in response to the identified species, to automatically

recognize the destination and operation corresponding to the identified species, and (3) that

transmits the determined destination and operation to the network, as recited in claim 1.

(1) Yamakita fails to teach or suggest an image identifying server that identifies the species of an operation document from an operation document image

The Examiner admits that while Yamakita teaches a host unit, Yamakita fails to mention

that the host unit is a server. According to the Examiner, Yamakita discloses that the host unit

recognizes received speech data, converts the recognized speech data into text data, extracts a

specific word from the converted text data, and generates formatted text data having a

predetermined format by inserting the extracted word into a specified field of the converted text

data, and transmits the generated formatted text through the network. From this, the Examiner

concludes that it would have been obvious at the time the invention was made to one of ordinary

skill in the art to consider the host unit as an image identifying server since it identifies the

species of the operation to automatically recognize the result and transmit the recognized result

to the network.

According to claim 1, the image identifying server identifies the species of an operation

document from an operation document image. However, Yamakita fails to teach or suggest the

use of document images, let alone the use of an image identifying server for processing a

document image. The received speech data of Yamakita is clearly different from an operation

document image representing an operation document. Furthermore, the host unit's extraction of

a specific word from the converted text data, as disclosed in Yamakita, is not for purposes of

identifying the species of an operation document image as recited in claim 1. Additionally,

Applicant's disclosure clearly indicates that the species of an operation document image may be

represented in a non-textual manner, for example, by the location of lines in an operation

document image. *See, e.g.,* Applicant's col. 6., lines 1-4.

> *(2) Yamakita fails to teach or suggest an image identifying server that retrieves the species stored in the workflow control table in response to the identified species, to automatically determine the destination and operation corresponding to the identified species*

According to the Examiner, Yamakita discloses that the host unit recognizes received

speech data, converts the recognized speech data into text data, extracts a specific word from the

converted text data, and generates formatted text data having a predetermined format by inserting

the extracted word into a specified field of the converted text data, and transmits the generated

formatted text through the network. From this, the Examiner concludes that it would have been obvious at the time the invention was made to one of ordinary skill in the art to consider the host unit as an image identifying server since it identifies the species of the operation to automatically recognize the result and transmit the recognized result to the network.

However, Yamakita fails to teach or suggest using an identified species, representing an operation document to automatically recognize a destination of an operation document image and the operation to be performed on the operation document image at the destination. Likewise, the Examiner's comments make no reference to the host unit of Yamakita retrieving a species stored in a workflow control table in response to the identified species, to automatically recognize the destination of the operation document image and the operation to be performed on the operation document image at the destination.

(3) Yamakita fails to teach or suggest an image identifying server that transmits the destination and operation, corresponding to the identified species, to the network

According to the Examiner, Yamakita discloses that the host unit recognizes received speech data, converts the recognized speech data into text data, extracts a specific word from the converted text data, and generates formatted text data having a predetermined format by inserting the extracted word into a specified field of the converted text data, and transmits the generated formatted text through the network. From this, the Examiner concludes that it would have been obvious at the time the invention was made to one of ordinary skill in the art to consider the host unit as an image identifying server since it identifies the species of the operation to automatically recognize the result and transmit the recognized result to the network.

However, Yamakita fails to teach or suggest an image identifying server that transmits the destination and operation, corresponding to the identified species, to the network. The transmission of formatted text data through the network of Yamakita does not teach or suggest the transmission of a destination of an operation document image and an operation to be performed on the operation document image at the destination, as determined from a workflow control table using an identified species of the operation document image, as recited in claim 1.

Furthermore, Applicant respectfully submits that the differences in structure and function between Yamakita and Applicant's invention as claimed represent evidence that Yamakita is non-analogous art. To the extent that Yamakita is non-analogous art, a rejection under 35 U.S.C. § 103(a) over Yamakita is improper. *See, e.g.,* MPEP § 2141.01(a).

For at least the above reasons, Applicant submits that Yamakita fails to teach or suggest **all** of the features recited in claim 1, as required for a *prima facie* case of obviousness under § 103. Therefore, Applicant respectfully submits that claim 1 is not obvious under 35 U.S.C. § 103(a) over Yamakita.

Applicant respectfully submits that dependent claims 2-8 and 10 are not obvious based at least on their dependency from non-obvious claim 1. Independent claims 12 and 13 are similar to claim 1, and Applicant respectfully submits that they are not obvious under 35 U.S.C. § 103(a) over Yamakita for at least the same reasons given above for claim 1. Accordingly, Applicant respectfully requests withdrawal of the rejections and allowance of claims 1-8, 10, and 12-13.

IV. Claims 9 and 11 are patentable over Yamakita, and further in view of U.S. Patent No. 5,410,416, issued to Amberg, et al.

Claims 9 and 11 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Yamakita, and further in view of U.S. Patent No. 5,410,416, issued to Amberg, et al. (hereinafter "Amberg"). Applicant submits that dependent claims 9 and 11 are not obvious based at least on their dependency from non-obvious claim 1. Accordingly, Applicant respectfully requests withdrawal of the rejections and allowance of claims 9 and 11.

V. New claim 14 is allowable

Applicant has added new claim 14 to further define the define the claimed invention. Applicant respectfully submits that new claim 14 is allowable for at least the same reasons as pending claim 1, from which it is dependent. Applicant respectfully requests the allowance of new claim 14.
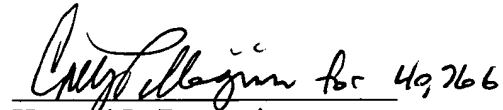
VI. Conclusion

In view of the above, reconsideration of claims 1-13, consideration of new claim 14, and allowance of claims 1-14 currently pending in the application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

AMENDMENT
U.S. Appln. No 09/244,419

Applicant hereby petitions for any extension of time which may be required to maintain

the pendency of this case, and any required fee, except for the Issue Fee, for such extension is to

be charged to Deposit Account No. 19-4880.

Respectfully submitted,

SUGHRUE MION, PLLC
2100 Pennsylvania Avenue, N.W.
Washington, D.C. 20037-3213
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

Howard L. Bernstein
Registration No. 25,665

Date: March 5, 2002

APPENDIX

VERSION WITH MARKINGS TO SHOW CHANGES MADE

IN THE CLAIMS:

Claim 14 is added as a new claim.